

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE  
APPLICATION OF ADIDAS AG FOR AN  
ORDER OF ATTACHMENT IN AID OF  
ARBITRATION

Misc. No.: 22-mc-320-VEC

**DECLARATION OF RUSTY ALLEN  
IN SUPPORT OF YEEZY, LLC AND  
YEEZY MARKETING, LLC'S  
MOTION TO VACATE ORDER  
GRANTING *EX PARTE*  
ATTACHMENT**

I, Rusty Allen, declare as follows:

1. I am a certified public accountant, and I am serving as the outsourced accounting department for Ye, Yeezy, LLC, and its affiliates and subsidiaries. I make this declaration in support of Yeezy's Motion to Vacate Order Granting *Ex Parte* Attachment. The statements contained herein are made upon my personal knowledge. If called as a witness, I would and could competently testify as set forth herein.

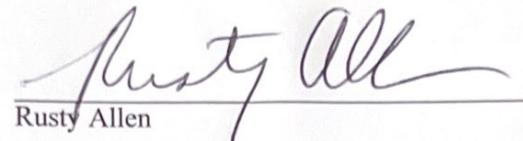
2. I am personally familiar with the assets, liabilities, cash flow, and overall financial condition of Yeezy, LLC and its affiliates, including, but not limited to, Yeezy Marketing, LLC ("Yeezy Marketing") and Yeezy Footwear, LLC ("Yeezy Footwear") (collectively, "Yeezy") as of the date of this declaration.

3. Neither Yeezy as a whole, nor Yeezy, LLC, Yeezy Marketing, or Yeezy Footwear individually, could currently be considered insolvent under any generally accepted definition of insolvency. Each of those entities has assets that exceed its liabilities. In addition, each of those entities is able to pay its debts as they come due as of the date of this declaration.

[REDACTED]

**I declare under penalty of perjury that the foregoing is true and correct.**

Executed on May 16, 2023, in Brookeville, Maryland.

  
Rusty Allen

**CERTIFICATE OF SERVICE**

I hearby certify that I caused a true copy of the foregoing **DECLARATION OF RUSTY ALLEN IN SUPPORT OF YEEZY, LLC AND YEEZY MARKETING, LLC'S MOTION TO VACATE ORDER GRANTING EX PARTE ATTACHMENT** to be served on:

Mark P. Goodman  
William H. Taft V  
Floraine Lavaud  
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*Counsel for Petitioner adidas AG*

DATED: May 16, 2023

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